



The Dow Chemical Company
Midland, Michigan 48674

2030 DOW CENTER
March 26, 20067

Mr. Mark Stoebner
Director
Texas Commission on Environmental Quality
12100 Park 35 Circle
Austin, TX 78753

COPY

LETTER FROM CHIEF FINANCIAL OFFICER

Dear Mr. Stoebner:

I am the chief financial officer of The Dow Chemical Company, 2030 Dow Center, Midland, Michigan, 48674. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure, post closure, or corrective action as specified in 30 Texas Administrative Code (TAC) Chapter 37 (relating to Financial Assurance).

The firm identified above is the owner or operator of the following facilities for which liability coverage for both sudden and nonsudden accidental occurrences is being demonstrated through the financial test specified in 30 TAC §37.541 (relating to Financial Test for Liability):

<u>EPA ID#</u>	<u>NAME/ADDRESS</u>	
<u>REGION 6</u>		
TXD008092793	The Dow Chemical Company Texas Operations B-1226 Freeport, TX 77541	Sudden = \$2,000,000 Nonsudden = \$6,000,000
TXR000057414	The Dow Chemical Company Clear Lake Operations 9502B Bayport Boulevard Pasadena, TX 77507	Sudden = \$2,000,000

The firm identified above guarantees, through the guarantee specified in 30 TAC §37.551 (relating to Corporate Guarantee for Liability), liability coverage for both sudden and nonsudden accidental occurrences at the following facilities owned or operated by the following:

None.

The firm identified above is the direct or higher-tier parent corporation of the owner or operator.

1. The firm identified above owns or operates the following facilities in Texas for which financial assurance for closure, post closure, or corrective action or liability coverage is demonstrated through a financial test specified in 30 TAC Chapter 37. The current cost estimates covered by the test are shown for each facility:

990532



REGION 6

TXD008092793	The Dow Chemical Company Texas Operations B-1226 Freeport, TX 77541	Closure = \$7,286,914 Post-Closure = \$6,773,826 Corrective Action = \$165,260,004
TXD000017756	The Dow Chemical Company La Porte Facility PO Box 687 La Porte, TX 77571	Corrective Action = \$4,250,000
TXR000057414	The Dow Chemical Company Clear Lake Operations 9502B Bayport Boulevard Pasadena, TX 77507	Closure = \$939,685

2. The firm identified above guarantees, through a corporate guarantee specified in 30 TAC Chapter 37, the cost for closure, post closure, corrective action, or liability coverage of the following facilities owned or operated by the guaranteed party. The current cost estimates so guaranteed are shown for each facility:

REGION 6

TXD096037932 Used Oil #A85819	Johann Haltermann Ltd. Dow Haltermann Houston Jacintoport Plant 16717 Jacintoport Boulevard Houston, TX 77015	Closure = \$292,575
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3. In States where TCEQ is not administering the financial requirements of 30 TAC Chapter 37, this firm, as owner, operator, or guarantor, is demonstrating financial assurance for the closure, post closure, or corrective action of the following facilities through the use of a test equivalent to a financial test specified in 30 TAC Chapter 37. The current cost estimates covered by such a test are shown for each facility:

REGION 1

CT001159730	The Dow Chemical Company Allyn's Point Route 12 Gales Ferry, CT 06335	Closure = \$173,960
NHD048724173	Hampshire Chemical Corp. 2 East Spit Brook Road Nashua, NH 03060-5633	Corrective Action = \$1,300,000

REGION 4

GAD045929643	The Dow Chemical Company Dalton Plant 1468 Prosser Drive, SE Dalton, GA 30720	Corrective Action = \$4,045,656
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REGION 5

MID000724724	The Dow Chemical Company MI Division/MI Plant 1261 Building Midland, MI 48674	Closure = \$99,793,268 Post-Closure = \$2,360,300
MID980617435	The Dow Chemical Company MI Division/Salzburg Plant Salzburg & Waldo Roads Midland, MI 48640	Closure = \$7,026,207 Post-Closure = \$1,517,565
OHD039128913	The Dow Chemical Company Hanging Rock Plant Old 52 Highway Ironton, OH 45638	Closure = \$168,743

REGION 6

LAD008187080	The Dow Chemical Company Louisiana Division PO Box 150 Plaquemine, LA 70764	Closure = \$4,224,589 Post-Closure = \$501,063 Corrective Action = \$1,269,000
LAD020597597	Angus Chemical Company Sterlington Facility PO Box 1325 Sterlington, LA 71280	Closure = \$118,469

REGION 9

CAD076528678	The Dow Chemical Company Pittsburg Plant PO Box 1398 Pittsburg, CA 94565	Closure = \$2,765,400 Postclosure = \$1,834,757 Corrective Action = \$59,283,625 Groundwater Treatment Plant Closure = \$152,162
CAD009547050	The Dow Chemical Company Torrance Plant 305 Crenshaw Torrance, CA 90503	Closure = \$472,215

4. The firm identified above owns or operates the following facilities for which financial assurance for closure, post closure, or corrective action, is not demonstrated either to TCEQ, a federal agency or a State through the financial test or any other financial assurance mechanisms specified in 30 TAC Chapter 37 or equivalent State mechanisms. The current cost estimates not covered by such financial assurance are shown for each facility:

None.

5. This firm is the owner or operator or guarantor of the following facilities for which financial assurance is being demonstrated under other EPA regulations or state programs authorized by EPA through a financial test or guarantee. The following amounts have not been included in Paragraphs 1 through 4.

- (a) Municipal solid waste management facilities under 30 TAC Chapter 330, 40 CFR part 258 or equivalent: None.
- (b) Underground injection control facilities under 30 TAC Chapter 331, 40 CFR part 144 or equivalent: \$749,575

REGION 6

ARD982286874	The Dow Chemical Company Highway 371 Magnolia, AR 71753	Plugging & Abandonment = \$514,650
LAD020597597	Angus Chemical Company Sterlington Facility PO Box 1325 Sterlington, LA 71280	Plugging & Abandonment = \$234,925

- (c) Petroleum underground storage tank facilities under 30 TAC Chapter 334, and 40 CFR part 280 or equivalent: None.
- (d) PCB storage facilities under 40 CFR part 761 or equivalent: None.
- (e) Hazardous waste treatment, storage, and disposal facilities under 30 TAC Chapter 335, 40 CFR parts 264 and 265 or equivalent: \$8,380,057

30 TAC 335/EQUIVALENT:

REGION 1

072-IL	The Dow Chemical Company Allyn's Point Route 12 Gales Ferry, CT 06335	Closure = \$173,960
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REGION 6

GPD0470107 P-0069	The Dow Chemical Company Block 80 Industrial Solid Waste Landfill Pactherm Burner PO Box 150 Plaquemine, LA 70765	Closure = \$6,084,377 Post-Closure = \$1,166,542 Pactherm Closure = \$27,004
GD0733625	Angus Chemical Company Waste Water Treatment Plant Lagoon 5000 Horeshoe Lake Road Sterlington, LA 71280	Closure = \$608,537 Post-Closure = \$319,637

- (f) Additional environmental obligations not shown above: None.

Total (a) - (f) \$9,129,632

This owner, operator, or guarantor has not received an adverse opinion, a disclaimer of opinion, or a going concern qualification from an independent auditor on its financial statements for the latest completed fiscal year.

This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year. The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 2006.

PART B. CLOSURE, POST CLOSURE, CORRECTIVE ACTION, AND LIABILITY COVERAGE


ALTERNATIVE II

- | | | |
|-----|--|-------------------|
| 1. | Sum of current closure, post closure, and corrective action cost estimates (total of all cost estimates listed above) | \$380,939,615 |
| 2.. | Amount of annual aggregate liability coverage to be demonstrated | \$8,000,000 |
| 3. | Sum of lines 1 and 2 | \$388,939,615 |
| 4. | Current bond rating of most recent issuance and name of rating service | A- (S&P) |
| 5. | Date of issuance of bond | November 22, 2002 |
| 6. | Date of maturity of bond | November 15, 2007 |
| *7. | Tangible net worth (if any portion of the current cost estimates is included in total liabilities you may add that portion to this line) | \$13,366,000,000 |
| *8. | Total assets in the U.S. (Required only if less than 90% of assets are located in the U.S.) | \$22,672,000,000 |

- | | <u>YES</u> | <u>NO</u> |
|---|------------|-----------|
| 9. Is line 7 at least \$10 million? | X | |
| 10. Is line 7 at least 6 times line 3? | X | |
| *11. Are at least 90% of assets located in the U.S.? (If not, complete line 12) | | X |
| 12. Is line 8 at least 6 times line 3? | X | |

I hereby certify that the wording of this letter is identical to the wording specified in 30 TAC §37.651 as such regulations were constituted on the date shown immediately below.

RWC/mro


Geoffery E. Merszel
Executive Vice President
And Chief Financial Officer
The Dow Chemical Company

March 26, 2007

cc: Michele Osmun, The Dow Chemical Company, 2030 Dow Center, Midland, MI
Janice Barber, The Dow Chemical Company, La Porte, TX
Alan Booth, The Dow Chemical Company, Freeport, TX
Jeff Jack, Johann Haltermann Ltd., Houston, TX
Barbara Partridge, The Dow Chemical Company, Pasadena, TX
Steve Beisser, The Dow Chemical Company, La Porte, TX

NOTE: Please direct all correspondence related to this letter to Michele Osmun, 2030 Dow Center, Midland, MI 48674. Phone (989) 636-5581 or Fax (989) 638-9636.